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CHIEF CLERK'S OFFICE

Illinois Bell Telephone Company)	
)	
Application for Review of Alternative)	Docket No. 98-0252
Regulation Plan)	
Illinois Bell Telephone Company)	
)	
Petition to Rebalance Illinois Bell)	Docket No. 98-0335
Telephone Company's Carrier Access and)	
Network Access Line Rates)	
)	
Citizens Utility Board, People of the State of)	
Illinois)	Docket No. 00-0764
v.)	
Illinois Bell Telephone Company)	(Consol.)

OPPOSITION TO
AT&T'S PETITION FOR CLARIFICATION

The People of the State of Illinois, by James Ryan, the Cook County State's Attorney's Office and the Citizens Utility Board ("Responding Parties") submit the following opposition to AT&T's Petition for Clarification, filed on September 3, 2002. In support of their opposition, the Responding Parties state as follows:

1. This matter was submitted to the Commission as a Joint Proposal of the Responding Parties, together with the City of Chicago, and Ameritech Illinois. The Commission held evidentiary hearings on the Joint Proposal, giving all parties an opportunity to conduct discovery, submit evidence, conduct cross-examination and submit briefs.

2. In describing how the Joint Proposal would be implemented, Ameritech

Illinois witness Rhonda Johnson stated that Ameritech Illinois would credit customers of record at the time the credit is issued, if the Joint Proposal was approved by the Commission. AI Ex. 14 at 3.

3. Neither AT&T nor any other party questioned this method of distribution or suggested an alternative method of distribution. See, e.g., Jt CLEC Ex. 1.0 at 4-5; McLeodUSA Ex. 2.0 at 2 (Purpose of Testimony).

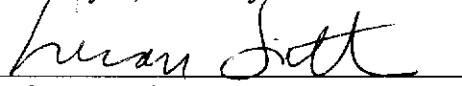
4. The Responding Parties assume that the Commission's Order on August 13, 2002 approving the Joint Proposal reflects the Commission's intention to approve the method of distribution described in AI witness Rhonda Johnson's testimony, referenced above.

5. The Responding Parties and the consumers of Illinois would be prejudiced if AT&T's failure to raise this issue at the appropriate stage of the proceeding is allowed to delay the implementation of the merger savings credit, which the parties proposed in January, 2002.

Wherefore, the Responding Parties respectfully request that the Commission deny AT&T's Motion for Clarification, and allow the credits to be issued as contemplated in the Joint Proposal.

Respectfully submitted:

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Dated: September 11, 2002

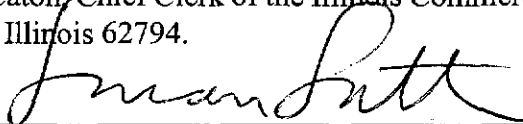
STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

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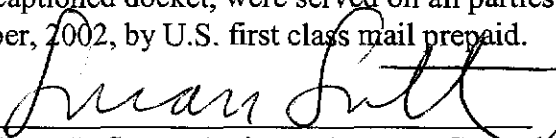
NOTICE OF FILING

PLEASE TAKE NOTICE that on this date, September 11, 2002, I have filed with the Chief Clerk of the Illinois Commerce Commission the enclosed "Opposition to AT&T's Petition for Clarification" on behalf of the People of the State of Illinois, the Citizens Utility Board and the People of Cook County in the above-captioned docket, by delivering the same via overnight mail to the Office of the Chief Clerk, Donna Caton, Chief Clerk of the Illinois Commerce Commission, at 527 East Capitol Avenue, Springfield, Illinois 62794.


Susan L. Satter, Assistant Attorney General

CERTIFICATE OF SERVICE

I, Susan L. Satter, hereby certify that copies of the enclosed "Opposition to AT&T's Petition for Clarification" on behalf of the People of the State of Illinois, the Citizens Utility Board and the People of Cook County, in the above-captioned docket, were served on all parties on the attached service list on the 11th day of September, 2002, by U.S. first class mail prepaid.


Susan L. Satter, Assistant Attorney General

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